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9 **and WATCHDOG AI, INC.**

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18 Attorneys for Defendant,
19 **PARAMOUNT GLOBAL**

20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA**

22 JOSEPH RAYHBUCK p/k/a FAT CODA
23 STUDIOS, an individual, and
24 WATCHDOG AI, INC., a California
25 corporation,

26 Plaintiffs,

27 v.

28 PARAMOUNT GLOBAL, a Delaware
corporation,

Defendant.

CASE NO: 2:25-cv-01605-JLS-AJR_x

**STIPULATION TO ORDER
DISMISSING ACTION WITH
PREJUDICE**

[Proposed] Order submitted herewith

*Assigned to the Hon. Josephine L.
Staton*

Action Filed: February 25, 2025

Plaintiffs JOSEPH RAYHBUCK p/k/a FAT CODA STUDIOS and
WATCHDOG AI, INC. (collectively, "Plaintiffs") and Defendant PARAMOUNT

1 GLOBAL (“Defendant”), through their respective counsel, hereby enter the following
2 stipulation respecting Plaintiff’s filing of a First Amended Complaint and Defendant’s
3 filing of a response thereto. This Stipulation is based upon the following:

4 WHEREAS, Plaintiffs filed their initial Complaint on February 25, 2025
5 (Dkt. 1);

6 WHEREAS, Plaintiffs effected service of the Complaint on Defendant on March
7 4, 2025 (Dkt. 15);

8 WHEREAS, the Parties entered into a settlement agreement to resolve this
9 action;

10 WHEREAS, on July 24, 2025, this Honorable Court dismissed this action
11 without prejudice, with the Parties to bear their respective attorneys’ fees and costs,
12 and for the Court to retain jurisdiction pending the Parties’ completion of their
13 settlement (Dkt. 26); and

14 WHEREAS, Defendant has complied with its obligations under the settlement
15 agreement.

16 Based on the foregoing, the Parties hereby stipulate as follows:

17 1. Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), the Parties, through their
18 respective attorneys of record, stipulate to the entry of the accompanying Order
19 dismissing this action, in its entirety, with prejudice, and with Plaintiffs, on the one
20 hand, and Defendant, on the other hand, to bear their respective attorneys’ fees and
21 costs.

22 Dated: August 8, 2025

VALKYRIE LAW GROUP, P.C.

HEATHER L. BLAISE, ESQ.

By: /s/ Heather L. Blaise

Attorneys for Plaintiffs

27 Dated: August 8, 2025

KATTEN MUCHIN ROSENMAN LLP

DAVID HALBERSTADTER

By: /s/ David Halberstadter

Attorneys for Defendant

I, Heather L. Blaise, hereby attest that all other signatories listed above, on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.